

**EXHIBIT 1**

**DECEMBER 14 EMAIL**

**Rich, Robert A.**

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**From:** Rich, Robert A.  
**Sent:** Wednesday, December 14, 2016 6:58 PM  
**To:** 'mshifrin@bakerlaw.com'  
**Subject:** Picard v. Edward A. Zraick, Jr. et. al., Adv Pro No. 10-05257

Max,

Defendants are considering whether to retain a rebuttal expert in coordination with other defense counsel. It is taking some time to coordinate, and so Defendants request an extension of the Dec 16 deadline for disclosure of rebuttal experts. Please advise if the Trustee will consent to such an extension.

Further, the Defendants intend to file motions in limine to exclude all or portions of the testimony of Ms. Collura and Mr. Greenblatt, and so I think it makes sense to have disclosure of rebuttal experts, if necessary, after resolution of those motions.

Finally, Defendants will be noticing the depositions of Ms. Collura and Mr. Greenblatt. Does the Trustee intend seek any omnibus procedures with respect to such depositions? Of course, Defendants reserve their rights to seek the deposition of Mr. Dubinsky as well.

Thanks,  
Rob

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